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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

BOSTON DENTAL GROUP, LLC, a Nevada  
limited liability company,

Plaintiff,

vs.

AFFORDABLE CARE, LLC, a North  
Carolina limited liability company,

Defendant.

**Case No.: 2:16-cv-01636-RFB-CWH**

**STIPULATION AND PROPOSED  
ORDER TO EXTEND THE PRETRIAL  
ORDER DEADLINE TWENTY-EIGHT  
(28) DAYS TO JUNE 14, 2018**

**(SECOND REQUEST)**

**AND RELATED COUNTERCLAIM**

Pursuant to LR IA 6-1 and 6-2, it is hereby agreed to and stipulated between Plaintiff/Counterclaim Defendant Boston Dental Group, LLC ("Boston Dental"), by and through its counsel, Michael R. Mushkin & Associates P.C. and Borghese Legal, Ltd., on the one hand, and Defendant/Counterclaim Plaintiff Affordable Care, LLC ("Affordable Care"), by and through its counsel, Kolesar & Leatham and Barack Ferrazzano Kirschbaum & Nagelberg LLP, on the other hand, to a twenty-eight (28) day extension of the May 17, 2018 Joint Pretrial Order deadline, until June 14, 2018, for the purpose of allowing the parties to finalize a settlement agreement in principle, as further set forth herein. This is the second stipulation for extension of time to extend the Joint Pretrial Order deadline.

On April 24, 2018, this Court extended the Pretrial Order deadline to May 17, 2018 to allow the parties time to reach a settlement agreement. Since that time, the parties have successfully reached an agreement in principle and are working to finalize a settlement agreement. The parties now seek a brief twenty-eight (28) day extension of the Joint Pretrial Order deadline in order to finalize and execute the settlement agreement. The litigation of this matter will be best served by the proposed extension. There is good cause to grant the parties' second stipulation for extension of time because the parties only seek the extension to allow time to finalize the settlement in principle. *See Fernandez v. N.V.*, Case No. 2011 WL 3957612 at \*2 (Dist. Nev. Sept. 6, 2011) (granting motion for extension of time to file pretrial brief because parties engaged in settlement negotiations).

Accordingly, the parties stipulate that the deadline for the Joint Pretrial Order be extended for twenty-eight (28) days from May 17, 2018 to June 14, 2018.

**IT IS SO STIPULATED.**

DATED this 17th day of May, 2018  
**KOLESAR & LEATHAM**

DATED this 17th day of May, 2018  
**BORGHESE LEGAL, LTD.**

By /s/ Sharon E. Calhoun

By /s/ Mark Borghese

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16 **ORDER**

17 **IT IS SO ORDERED.**  
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RICHARD F. BOULWARE, II  
21 UNITED STATES DISTRICT JUDGE  
22 DATED this 18th day of May, 2018.  
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